

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 — PHONE 943-2201

FOLEY, ALABAMA 36535

September 11, 1967

Honorable Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama 36507

Re: Monsanto Company
Vs: J. W. Kinsey
Case No. 7511

Dear Judge Mashburn:

Kindly render a judgment in this case on an
itemized sworn to verified statement of account
in the principal amount of \$3,031.68, plus interest
for 144 months of \$212.00, for a total of \$3,243.68.

Cordially yours,



FOREST A. CHRISTIAN

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons J. W. KINSEY, to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at the place of holding same by MONSANTO COMPANY, a Delaware corporation.

Witness my hand this the 9 day of May, 1967.


Clerk

** ** *

COMPLAINT

MONSANTO COMPANY, a Delaware corporation,	X	
	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	
	X	AT LAW
J. W. KINSEY,	X	
	X	CASE NO. _____
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant THREE THOUSAND THIRTY-ONE & 68/100 DOLLARS (\$3,031.68), due from him by account on, to wit: the 1st day of July, 1965, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant THREE THOUSAND THIRTY-ONE & 68/100 DOLLARS (\$3,031.68), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of July, 1965, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant THREE THOUSAND THIRTY-ONE & 68/100 DOLLARS (\$3,031.68), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of July, 1967, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 26th day of April, 1967.

ATTORNEY FOR THE PLAINTIFF


Forest A. Christian, Foley, Alabama

Defendant's address:
Route 1, Box 46
Foley, Alabama 36535

FILED

MAY 9 1967

IMPORTANT! Read over slowly. Fill out very carefully. Attach itemized statement in duplicate showing each debit and credit supported by triplicate invoices of each debit. Do not strike out, change or add to except where indicated.

STATE OF.....Missouri.....
COUNTY OF.....St. Louis.....

Before me, the undersigned authority, on this day personally appeared.....J. L. Zoellner....., known to me, who being duly sworn, upon oath deposes and says that he is Credit Mgr., Ag. Div. and duly authorized agent of

(Position held)

MONSANTO COMPANY

(Trade name or name of company)

A corporation duly incorporated and existing under the laws of the State of.....Delaware.....
a partnership consisting of.....

Owned and operated by....., a sole trader, residing in the County of.....St. Louis....., State of....., and that as such he makes this affidavit: that he is familiar with the books of said corporation, partnership, or Sole

(Leave only one)

Trader; that the attached account against.....J. W. Kinsey....., constituting this cause of action, is taken from original books of entry, and is just and true within the knowledge of this affiant; that all just and lawful offsets, payments and credits have been allowed and that the sum of Three thousand thirty one and 68/100-----Dollars (\$3,031.68), with interest thereon at the legal rate from the 1st day of January next following the date or dates thereof is due, owing and unpaid.

J. L. Zoellner.
(Affiant)

Subscribed and sworn to before me this 26th day of April A. D. 19 67

(SEAL)

210

Iona Caupert.
Notary Public in and for the County and State first hereinbefore written.

My commission expires Aug. 17 A. D. 19 69

This act performed in St. Louis County which adjoins the city of St. Louis for which I was commissioned.

Iona Caupert
Notary must PRINT name hereon.

STATEMENT MONSANTO CHEMICAL COMPANY

800 North Lindbergh Boulevard
St. Louis, Mo. 63166

J. W. Kinsey
Route 1, Box 46
Foley, Alabama

LEDGER NO.	MO.	DAY	YEAR
468047 204	4	12	66

TRANSACTION CODE	
1. INVOICE	4. CASH
2. DEBIT MEMO	5. VOUCHER
3. CREDIT MEMO	6. JOURNAL ENTRY
7. BALANCE FORWARD	

✓	DATE			REFERENCE	*TRANS-ACTION	DEBITS		CREDITS		BALANCE	
	11	7	63	40590	1	274	00				
	11	16	63	40638	1	588	00				
	3	7	64	40879	1	434	50				
	4	25	64	47634	1	133	40				
	5	18	64	41048	1	264	57				
	5	18	64	41048	1				4	29	
	11	14	64	40398	1	201	00				
	3	15	65	40324	1	268	00				
	4	3	65	40115	1	121	50				
	4	13	65	40251	7	668	00				
	5	8	65	41011	1	101	00				
	7	17	65	43586	1	150	00				
	7	17	65	43587	1	150	00				
	7	17	65	43588	1	150	00				
	9	8	65	43766	1	200	00				
	2	28	66	02404	6			65	00		
	7	1	65	4	4			603	00		
										3031	68

FORM 271

THIS STATEMENT IS FOR THE PURPOSE OF COMPARISON. IF THERE IS ANY DIFFERENCE PLEASE NOTIFY US PROMPTLY.

Received 9 day of May 1967
and on 9 day of August 1967
I served a copy of the within \$400
on J. W. Kinsey
By service on J. W. Kinsey

TAYLOR WILKINS, Sheriff
By J. M. Eastman D. S.
Foley, Ala.

Sheriff claims 72 miles at
Ten Cents per mile. Total \$ 7.20
TAYLOR WILKINS, Sheriff
By J. M. Eastman
DEPUTY SHERIFF

(Foley)

SUMMONS AND COMPLAINT

MONSANTO COMPANY, a Delaware
corporation,

PLAINTIFF,

TO

J. W. KINSEY,

DEFENDANT.

FILED
MAY 9 1967
CLERK
COURT

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA